

Of the eleven parties who submitted comments,⁴ none opposed the changes proposed by the Commission in the NPRM. Some commenters went one step further, asserting that these new services reports have become unnecessary altogether.⁵ U S WEST agrees with these commenters. The new services reports were intended to aid the Commission in its evaluation of the accuracy of carrier forecasts supporting net revenue projections for new services. In a recent decision, however, the Commission eliminated the net revenue test for new services under price caps.⁶ Without the net revenue test, the need for submitting the type of information contained in the new services reports essentially disappears.

If the Commission nonetheless decides to continue to require new services reporting, then U S WEST agrees that reporting on an annual basis is preferable to a quarterly reporting requirement. U S WEST also supports the suggestion submitted by other parties

⁴Ameritech Operating Companies ("Ameritech"), American Telephone and Telegraph Company ("AT&T"), The Bell Atlantic Telephone Companies, BellSouth Telecommunications, Inc. ("BellSouth"), GTE Service Corporation, et al., New England Telephone and Telegraph Company and New York Telephone Company ("NYNEX"), Rochester Telephone Corporation, The Southern New England Telephone Company ("SNET"), Southwestern Bell Telephone Company ("Southwestern Bell"), United Telephone Companies, and United States Telephone Association.

⁵Ameritech at 1; BellSouth at 2; NYNEX at 2; Southwestern Bell at 2. See also AT&T at 2; SNET at 1.

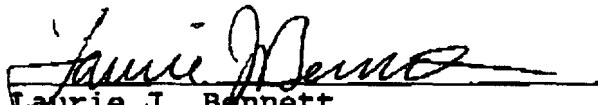
⁶Amendments of Part 69 of the Commission's Rules Relating to the Creation of Access Charge Subelements for Open Network Architecture; Policy and Rules Concerning Rates for Dominant

that only one annual report -- rather than the three annual reports contemplated by the NPRM -- be required.⁷ Since any new service is included in price cap indexing after its first year, there is no good reason to require additional reporting after the annual report for that first year.

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April 13, 1993

⁷ See BellSouth at 3; Southwestern Bell at 3; SNET at 2.

CERTIFICATE OF SERVICE

I, Rebecca Ward, do hereby certify on this 13th day of

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